

Eliot F. Krieger, P.C. (SBN 159647)  
[ekrieger@sullivankrieger.com](mailto:ekrieger@sullivankrieger.com)  
Heidi S. Lewis (SBN 98046)  
[hlewis@sullivankrieger.com](mailto:hlewis@sullivankrieger.com)  
Christopher L. Wong (SBN 178374)  
[cwong@sktlawyers.com](mailto:cwong@sktlawyers.com)  
SULLIVAN, KRIEGER,  
TRUONG, SPAGNOLA &  
KLAUSNER, LLP  
444 W. Ocean Blvd., Ste. 1700  
Long Beach, CA 90802  
(562) 597-7070 Telephone  
(562) 597-7772 Facsimile

*Attorneys for Defendants Lam Sin  
Yam, Ray Lim, Tiffany Ngo  
individually and as a trustee of the  
Tiffany Ngo Living Trust UTD, and  
Ngo Asset Management, LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Socheat Chy,

Plaintiff,

v.

Sing Lim; Ray Lim; Tiffany Ngo;  
Ngo Asset Management, LLC;  
Tiffany Ngo in her capacity as  
trustee of the Tiffany Ngo Living  
Trust UTD; Naing Lam Yam; Jane  
Doe 1; Cindy Kanya Chan; Molica  
Ratha Keo; Nivodeth Khiev;  
Defendant Doe Gas Station 2;  
Defendant Doe Gas Station 3;  
Defendant Doe Laundromat 4; and  
DOES 5 through 10, inclusive,

Defendants.

Case No. 2:17-cv-04325

**JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO FIRST  
AMENDED COMPLAINT AS TO  
DEFENDANTS LAM SIN YAM;  
RAY LIM; TIFFANY NGO;  
TIFFANY NGO IN HER CAPACITY  
AS TRUSTEE OF THE TIFFANY  
NGO LIVING TRUST; AND NGO  
ASSET MANAGEMENT, LLC**

Complaint served: June 19, 2017  
First Amended Complaint served:  
August 16, 2017  
Current response date: August 30, 2017  
New response date: September 7, 2017

Plaintiff Socheat Chy (“Socheat” or “Plaintiff”) by and through her  
counsel, and Defendants Lam Sin Yam (named in the Complaint as Defendant  
“Sing Lim”), Ray Lim, Tiffany Ngo, Tiffany Ngo in her capacity as trustee of  
the Tiffany Ngo Living Trust, and Ngo Asset Management, LLC (“Defendants”),

1 by and through their counsel, hereby stipulate to extend the time for Defendants  
2 to answer or otherwise respond, by motion to dismiss and/or motion to strike, to  
3 Plaintiff's First Amended Complaint to and including September 7, 2017.

4 WHEREAS, Plaintiff filed her Complaint on June 9, 2017 in the United  
5 States District Court, Central District of California.

6 WHEREAS, Plaintiff served Defendants with the Complaint on June 19,  
7 2017.

8 WHEREAS, Defendants' responsive pleading or motion to dismiss the  
9 Complaint was initially due on July 10, 2017.

10 WHEREAS, Plaintiff and Defendants jointly stipulated on June 30, 2017  
11 to a 30-day extension for Defendants to file responsive pleadings or a motion to  
12 dismiss the Complaint, due on August 9, 2017.

13 WHEREAS, Defendants' responsive pleading or motion to dismiss the  
14 Complaint was due on August 9, 2017.

15 WHEREAS, counsel for Defendants and Plaintiff timely engaged in the  
16 Conference of Counsel set forth in Local Rule 7-3 both by email and multiple  
17 conference calls, whereby counsel for Defendants and Plaintiff agreed to further  
18 extend the time for Defendants to respond to the complaint to August 16, 2017.

19 WHEREAS, this Court granted Defendants an extension to and including  
20 August 16, 2017, to answer or otherwise respond to the complaint.

21 WHEREAS, pursuant to the meet and confer efforts undertaken in the  
22 Conference of Counsel, Plaintiff filed a First Amended Complaint on August 16,  
23 2017, thereby eliminating Defendants' need to file a response to the complaint.

24 WHEREAS, the Defendants' response to the First Amended Complaint is  
25 due on August 30, 2017.

26 WHEREAS, pursuant to an August 30, 2017 Local Rule 7-3 meet and  
27 confer conference, counsel for Plaintiff and Defendants agree that Plaintiff may  
28

1 file on or before September 5, 2017, a Second Amended Complaint, adding a  
 2 Racketeer Influenced and Corrupt Organization Act ("RICO") claim, 18 U.S.C. §  
 3 1961 *et. seq.*, against Defendants, and Doe Gas Station 2, Doe Gas Station 3, and  
 4 Doe Laundromat 4, in lieu of Plaintiff filing a motion for leave to amend.

5 WHEREAS, Plaintiff's and Defendants' counsel further agree that such  
 6 agreement to file the Second Amended Complaint is without waiver of  
 7 Defendants' right to file responsive pleadings and/or motion to dismiss and/or  
 8 motion to strike in response to the Second Amended Complaint.

9 WHEREAS, as part of the meet and confer conference on August 30,  
 10 2017, counsel for Plaintiff and Defendants also agree and stipulate that  
 11 Defendants' time to answer or otherwise respond to the First Amended  
 12 Complaint shall be further extended to September 7, 2017, acknowledging that  
 13 such response to the First Amended Complaint will be unnecessary if Plaintiff,  
 14 as expected, files her Second Amended Complaint on or before September 5,  
 15 2017.

16 WHEREAS, good cause exists to grant this Joint Stipulation because it  
 17 will preserve Court and party resources, and for the reasons described in the  
 18 attached Declaration of Heidi Stilb Lewis.

19  
 20  
 21 Dated: August 30, 2017

SULLIVAN, KRIEGER, TRUONG,  
 SPAGNOLA & KLAUSNER LLP

22  
 23  
 24 By: /s/Heidi Stilb Lewis  
 Heidi Stilb Lewis (SBN: 98046)

25  
 26 Eliot F. Krieger, P.C. (SBN 159647)  
[ekrieger@sullivankrieger.com](mailto:ekrieger@sullivankrieger.com)  
 27 Heidi S. Lewis (SBN 98046)  
[hlewis@sullivankrieger.com](mailto:hlewis@sullivankrieger.com)  
 28 Christopher L. Wong (178374)

[cwong@sktlawyers.com](mailto:cwong@sktlawyers.com)  
SULLIVAN, KRIEGER, TRUONG,  
SPAGNOLA & KLAUSNER, LLP  
444 W. Ocean Blvd. Ste. 1700  
Long Beach, CA 90802  
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Attorney for Defendants Lam Sin Yam, Ray Lim,  
Tiffany Ngo individually and as a trustee of the  
Tiffany Ngo Living Trust UTD, and Ngo Asset  
Management, LLC

Dated: August 30, 2017

WILMER CUTLER PICKERING HALE AND  
DORR LLP

By: /s/Nancy Lynn Schroeder  
Nancy Lynn Schroeder (SBN: 280207)

Attorney for Plaintiff

**ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Heidi Stilb Lewis, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signature (/s/) within this e-filed document. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 30, 2017

SULLIVAN, KRIEGER, TRUONG,  
SPAGNOLA & KLAUSNER LLP

By: /s/Heidi Stilb Lewis  
Heidi Stilb Lewis (SBN: 98046)

Attorney for Defendants Lam Sin Yam, Ray Lim,  
Tiffany Ngo individually and as a trustee of the  
Tiffany Ngo Living Trust UTD, and Ngo Asset  
Management, LLC

**PROOF OF SERVICE**

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is Sullivan, Krieger, Truong, Spagnola & Klausner, LLP, 2 Park Plaza, Suite 900, Irvine, CA 92614.

On August 30, 2017, I served the forgoing document(s) described as:

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO THE FIRST AMENDED COMPLAINT AS TO DEFENDANTS LAM SIN YAM; RAY LIM; TIFFANY NGO; TIFFANY NGO IN HER CAPACITY AS TRUSTEE OF THE TIFFANY NGO LIVING TRUST; AND NGO ASSET MANAGEMENT, LLC;

On each interested party through their attorney of record, or at their last known address, as stated below.

[ ] (BY U.S. MAIL) I caused such document(s) to be deposited with the U.S. Postal Service by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California, addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Cindy Kanya Chan	Molica Ratha Keo	Nivodeth Khiev
9463 Arkansas Street	2550 Chesnut Ave.	2550 Chesnut Ave.
Bellflower, CA 90706	Long Beach, CA 90806	Long Beach, CA 90806

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 30, 2017, at Irvine, California.

/s/Lucy Tom  
Lucy Tom